

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

)	MDL No. 2419
)	No. 1:13-md-02419-RWZ
IN RE: NEW ENGLAND)	
COMPOUNDING PHARMACY, INC.)	
PRODUCTS LIABILITY LITIGATION)	
)	
THIS DOCUMENT RELATES TO:)	
ALL ACTIONS)	

COMMONWEALTH OF MASSACHUSETTS’
MOTION FOR A PROTECTIVE ORDER

The Commonwealth of Massachusetts (the “Commonwealth”) hereby moves pursuant to Fed. R. Civ. P. 26(c)(1) for a protective order providing that it shall not be required to produce any Rule 30(b)(6) witness for deposition under the subpoena dated March 18, 2015 served on the Massachusetts Board of Registration in Pharmacy by the Tennessee Clinic Defendants; and that said protective order remain in effect until thirty (30) days after the completion of the trial of *United States v. Cadden*, No. 1:14-cr-10363-RGS (D. Mass.), or the entry of guilty pleas by all defendants in that action.

The grounds for this motion are stated in its supporting memorandum and the Declaration of Carmen M. Ortiz (Exhibit A), filed herewith. A proposed order is attached to the Commonwealth’s memorandum as Exhibit B.

COMMONWEALTH OF MASSACHUSETTS
MAURA HEALEY, ATTORNEY GENERAL

s/ Ronald F. Kehoe

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CERTIFICATE OF COMPLIANCE WITH LR 7.1

I hereby certify that on June 9 and June 12, 2015 my colleague, Assistant Attorney General J. David Hampton, conferred via an exchange of letters with counsel for the Tennessee Clinic Defendants about the relief sought in this motion and was advised of his opposition to the motion.

s/ Ronald F. Kehoe

CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2015 I served this motion, the memorandum in support of the motion, Exhibit A to the motion, and Exhibit B, the proposed order, on all counsel of record by filing them with the Court by means of the court's ECF system.

s/ Ronald F. Kehoe